

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MARIA JOSE PIZARRO,

Plaintiff,

- against-

No. 20-CV-5783 (AKH)

EUROS EL TINA RESTAURANT LOUNGE
AND BILLIARS, CORP. SANTIAGO QUEZADA,
AND SANTIAGO QUEZADA, JR.,

Defendant.
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PLAINTIFF'S PROPOSED VOIR DIRE

The Plaintiff requests that prospective jurors be questioned as follows during jury selection:

1. Have you or someone you know ever worked in a hotel? If so,
 - a. Where?
 - b. In what capacity?
2. Do you know the Plaintiff Maria Jose Pizarro?
3. Do you know the Defendants Santiago Quezada, Sr. or Santiago Quezada, Jr.?
4. Have you ever heard of Euros El Tina Restaurant Lounge and Billiards Corp. in Manhattan, New York?
5. Have you ever heard of the Plaintiff's attorneys Evan Brustein or Mark Marino?
6. Have you ever heard of Defendants' attorney Martin Restituyo?
7. Do you know any of the following individuals who may testify in this matter?
 - a. Jose Eladio Castro
 - b. Cristian Argenis Guzman Dilone
8. Have you ever been involved in an employment discrimination lawsuit? If yes,
 - a. Did the jury reach a verdict?
 - b. How did you feel about the outcome?
 - c. Did you think it was fair?
 - d. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
9. Are you or anyone you know employed by or in any manner involved with either the legal profession or the administration of justice? If yes, Please explain.
10. Have you previously served upon a jury? If yes,
 - a. When?
 - b. In what court?
 - c. Was it a criminal or civil matter?
 - d. What was the case about?
 - e. Was a verdict reached?

- f. What was the verdict?
 - g. Can you put aside what you learned in that case, and the legal instructions you were given, and follow only the legal instructions given in this case?
 - h. Is there anything about the experience of serving as a juror in that case, make you believe that you cannot be fair and impartial in this case, or that you will have difficulty in rendering a verdict?
- 11. Where do you work? What do you do there?
 - 12. What do you do for fun?
 - 13. What television shows do you watch?
 - 14. Where do you get your news?
 - 15. What books, magazines, or newspapers do you read?
 - 16. The Judge will instruct you on what the law is, and he will ask you to apply the law to the evidence presented in court. Would you have difficulty following the law, even if you think that the law is wrong?
 - 17. Is there any personal or religious belief that would prevent you from rendering a verdict in this case?
 - 18. Is there any reason based on what you have seen and heard thus far and based upon your personal experiences, that makes you believe that you would hold a bias or sentiment either in favor or against either party in this case?

Dated: New York, New York
October 6, 2023

BRUSTEIN LAW PLLC
Counsel for Plaintiff

By: /s/ Evan Brustein
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